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November 19, 2012

**VIA ELECTRONIC MAIL**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1610  
New York, NY 10007-1312

**Re: FHFA Actions**

Dear Judge Cote:

I write to address FHFA's contention in its letter of today that it has produced "over 14,000 custodial documents for Shayan Salahuddin."

In their Stipulation regarding electronic discovery, the parties agreed to identify, in a metadata field titled, "Source", the custodian from whose files a document was produced. Attached is a screenshot, created this morning, of the results of a search for Mr. Salahuddin's name in the Source metadata provided by FHFA to Defendants. It lists 12 documents.<sup>1</sup>

I shared a draft of this letter with counsel for FHFA and asked for some proof supporting FHFA's contention regarding its production of Mr. Salahuddin's documents. In a response received moments ago, FHFA indicated its number was based on internal metadata it has withheld from Defendants (but intends to produce in the future).

Respectfully submitted,



Edward J. Bennett

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<sup>1</sup> Today's number reflects that additional productions have been loaded since Thursday's hearing, when the count was only 8.

Search

Tags

Workspace Fhfa Production

PRODBEG	PRODEND	SOURCE	PRODBEG
FHFA05467287	FHFA05467287	Salahuddin, Shayan	FHFA05467287
FHFA05467288	FHFA05467290	Salahuddin, Shayan	FHFA05467287
FHFA05467291	FHFA05467291	Salahuddin, Shayan	FHFA05467287
FHFA05467292	FHFA05467292	Salahuddin, Shayan	FHFA05467292
FHFA05467293	FHFA05467293	Salahuddin, Shayan	FHFA05467292
FHFA05467294	FHFA05467294	Salahuddin, Shayan	FHFA05467292
FHFA05467295	FHFA05467296	Salahuddin, Shayan	FHFA05467292
FHFA05467297	FHFA05467297	Salahuddin, Shayan	FHFA05467292
FHFA08075217	FHFA08075219	Salahuddin, Shayan	FHFA08075217
FHFA08075220	FHFA08075221	Salahuddin, Shayan	FHFA08075220
FHFA08075222	FHFA08075222	Salahuddin, Shayan	FHFA08075222
FHFA08075223	FHFA08075224	Salahuddin, Shayan	FHFA08075222